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CHALOS & CO, P.C.

*Attorneys for Plaintiff,
Dry Bulk Singapore Pte. Ltd.*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD.,

Plaintiff,

vs.

AMIS INTEGRITY S.A. *in personam* and
M/V AMIS INTEGRITY (IMO 9732412)
her engines, freights, apparel, appurtenances,
tackle, etc., *in rem.*,

Defendants.

No. 3:19-CV-01671-BR

Admiralty

**MOTION TO WITHDRAW AS COUNSEL
FOR PLAINTIFF DRY BULK
SINGAPORE PTE. LTD.**

MOTION

Pursuant to LR 83-11, counsel for defendant Dry Bulk Singapore Pte. Ltd. ("Dry Bulk") move the Court for an order allowing David R. Boyajian and C. Kent Roberts and Schwabe Williamson & Wyatt PC and Michael G. Chalos and Chalos & Co., P.C. to withdraw as counsel

for Dry Bulk. Professional considerations require both firms to terminate their representation.

Dry Bulk also requests a 60-day stay in order for Dry Bulk to seek out and engage new counsel. Dry Bulk specifically requests that the 60-day stay apply to Dry Bulk's obligation to post counter-security, per this Court's order.

Counsel for Dry Bulk conferred with Counsel for Defendant. Defendants do not oppose this motion or the requested 60-day stay, except that Defendants ask that the requested stay not apply to Dry Bulk's deadline to post counter-security.

DATED: April 9, 2020

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

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Dry Bulk Singapore PTE. LTD.*

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all associated counsel.

BY: s/ David R. Boyajian
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